

CLARENDON FOUNDATION

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June 14, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Searcy:

Re: Amendment of Part 74 of the Commission's Rules 7

Donna R. Searcy  
June 14, 1993  
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in order. We encourage the FCC to adopt a procedure by which entities with this sort of profile, however it may be more precisely defined, be permitted to continue to channel load until compression technology becomes a viable alternative for them as well.

Finally, it is imperative in our view to recognize that channel loading would not constitute a *de facto* reallocation of the ITFS spectrum. It is simply a less costly means for distribution of the signal. Moreover, the permissive nature of channel loading does not affect an ITFS licensee's ability to control its use of the channels in any fundamental way.

With these refinements, we believe the Commission's proposal will work substantial public benefits and should be adopted.

Very truly yours,



Kemp R. Harshman  
President